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FICE
Rockford Products Corporation

707 Harrison Avenue Rockford, Illinois 61108-7197 (815) 397-6000

Easy Link 910997-7453

March 19, 1986

2010300031 - GINNEBAG RECKFORD / RUCKFORD PROD # 3

Illinois Environmental Protection Agency Region 1 4302 North Main Street Rockford, Illinois 61103

Attention: Mr. Harris Chien

Manager

Dear Mr. Chien:

ROCKFORD PRODUCTS CORPORATION is submitting the following information requested from IEPA meeting held in your office on January 14, 1986 at 2:00 P.M.

After a telephone call to Rob Watson, on January 15, 1986, regarding the surveys for "Certification Regarding Potential Releases From Solid Waste Management Units (Closure Plan Review) , 8 separate form surveys were completed and sent to Lawerence Esteps office in Springfield, Illinois on January 28, 1986.

A revised air permit application was sent to Bharat Mathur on January 17, 1986, for (4) Detrex Degreasers. Permit to operate the (4) Detrex Degreasers was granted on February 24, 1986.

A ground water monitoring plan was prepared for ROCKFORD PRODUCTS CORP-ORATION submitted herewith by M. Rapps Assoc., Inc. in Springfield, Illinois.

Also a roof storm water plan was developed to minimize contaminents entering the seepage pit submitted herewith by Larry Hammond - Industrial Consultant.

ROCKFORD PRODUCTS CORPORATION has earnestly tried to answer all requirements from the January 14, 1986 meeting, and will continue to work closely with your office until all problems are resolved.

Sincerely yours,

ROCKFORD PRODUCTS CORP.

Harold W. Naill

Vice President of Mfg.

RECEIVED

MAR 24 1986

EPA-DLPC

HWN/nc

ROOF STORM WATER PLAN - 3-19-86

If as the result of the proposed ground water monitoring plan, it is ultimately determined that storm water run-off from roof of Plant #3 is causing contamination of the seepage pit, than ROCKFORD PRODUCTS CORPORATION will memedy that situation by one of several possible alternatives. Alternatives currently being considered are:

- a. Make quarterly checks of velocity and exhaust emissions from discharge stacks.
 - 5. Raise exhaust stacks from degreasers 20 feet. Two significant improvements should take place.
 - More condensation of 1,1,1 Trichlorethane will occur in the stack and be recaptured for reuse.
 - The added height of stacks will allow remaining stack emissions to stay in the atmosphere.
 - c. Modify internal cooling coils to reduce emission stack temperature which in turn will reduce stack emissions up to 40%.
 - d. To further investigate a proven European technology, using refrigeration chilling coils in the exhaust stacks, where emission reduction rates can be reduced by as much as 90%.
 - e. Lab analysis of seepage pit water, and samples from test wells will be sent to R. E. Wright Assoc., Inc. for study of volatile organic compounds, and the removal of v.o.c. by using an air stripping tower. If acceptable removal rates can be reached.

 ROCKFORD PRODUCTS CORPORATION must make a decision to use this process, or one of the following.

MAR 24 1988

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- II. Work with the Public Works Department City of Rockford to develop a plan for installation of a storm sewer at approximately the 2800 block on East side of Kishwaukee Street, so that, storm water run-off from roof of ROCKFORD PRODUCTS CORPORATION Plant #3 could enter, using controlled run-off procedures, and a N.P.D.E.S. Permit.
- III. Develop a plan with the Public Works Department City of Rockford for roof run-off water that will enter into a box culvert running parallel to East property line of ROCKFORD PRODUCTS CORPORATION using controlled run-off procedures and a N.P.D.E.S. Permit.
- IV. To investigate with the Public Works Department City of Rockford, if feasible to use a drainage ditch running from the West side of ROCKFORD PRODUCTS CORPORATION property to Rock River. After topography survey is made, a cost analysis should be made to clean out bottom of litch for 300 to 500 feet West of ROCKFORD PRODUCTS CORPORATION, so that, roof drainage will properly flow into drainage ditch.

After confirmation of lab reports for present volatile organic compounds, this may prove that a controlled system for run-off waters will be sufficient.

Harold W. Naill Vice President of Manufacturing

HWM/ric

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Rockford Products Corporation

Plant No. 3

Groundwater Monitoring Plan

M. Rapps Associates, Inc.

2387 WEST MONROE, SUITE 123, SPRINGFIELD, ILLINOIS 62704 — (217) 787-2118

Rockford Products Corporation Plant No. 3

Groundwater Monitoring Plan

Background

Rockford Products Corporation's (RPC) plant No. 3 is located at 707 Hagrison Avenue, Rockford, Illinois. The manufacturing facility, which utilizes various metal finishing processes in the course of its operations, is situated in the heavily industrialized Southeast sector of Rockford. Most of Rockford's industrial activity, principally metal finishing and fabricating, is housed in this part of the city. Adjacent property to the East contains abandoned rail lines, a construction company storage yard, and an auto salvage yard. A conglomeration of heavier manufacturing plants, material suppliers, etc., exists farther to the East, following the Harrison Avenue corridor for several miles. Similar activity exists to the West and Northwest of the plant, including an abandoned landfill, a large foundry, a steel drum reclaimer, and various other industrial operations. Scattered pockets of residential housing exist throughout these areas, in all directions from the plant. The plant site and surrounding areas are shown in Figure 1 in the attachments.

RPC plant No.3 is situated on relatively flat ground that has little natural drainage. As a consequence, storm water from plant buildings and parking areas, joined by drainage from properties to the East, tends to accumulate and pond on plant property. Attempts to divert this water to a municipal storm sewer were unsuccessful

and, as such, plant officials have found it necessary to design an on-site remedy. That solution consists of drainage features which gather and divert storm water to a dug pond or seepage pit. The main body of the seepage pit consumes a surface area of approximately one acre. Its maximum depth near the center is approximately eleven feet.

A permit to use the seepage pit was issued by the Illinois Environmental Protection Agency's (IEPA) Division of Water Pollution Control (CWPC) on March 21, 1984. That permit contains a special condition requiring installation of three monitoring wells subject to quarterly water quality testing. Water quality parameters to be monitored include Specific Conductance (S.C.), Chemical Oxygen Demand (COD), Total Organic Carbon (TOC), and Total Organic Halogens (TOX).

Requisite monitoring points were installed in January, 1985.

They consist of three two inch I.D. screw coupled PVC wells with slotted screens, each set at a depth of 35.0'. Well screen sections are ten feet in length and intercept the water table. In the second quarter subsequent to well installation, each well and the seepage pit (and attendant storm water ditches) were sampled for an extensive analysis. Results are:

Culvert and Pond Samples (5-8-85)

Sample Locations

Organic <u>Contaminant</u>	S.W. Culvert	S.E. <u>Culvert</u>	Pond	Mean	<u>Variance</u>
1,1,1-Trichloroethane 1,1-Dichloroethane 1,1-Dichloroethylene 1,2-t-Dichloroethylene Trichloroethylene	25 ppb	81 ppb	27 ppb	44.3	672.8
	5 ppb	15 ppb	5 ppb	8.3	22.2
	10 ppb	31 ppb	<5(2.5 ppb)	14.5	145.5
	7 ppb	16 ppb	<5(2.5 ppb)	8.5	31.5
	15 ppb	48 ppb	12 ppb	25	266

Sediment Samples (5-8-85)

Sample Location

Parameter	S.E. Sediment	S.F. Sediment @ 12"
Arsenic Barium Cadmium Chromium Lead Mercury Selenium	<pre>< 0.001 ppm 0.54 ppm 0.014 ppm 0.025 ppm 0.03 ppm < 0.001 ppm < 0.005 ppm</pre>	<pre>< 0.001 ppm 0.54 ppm 0.005 ppm 0.024 ppm 0.05 ppm < 0.001 ppm < 0.005 ppm</pre>
Silver	< 0.001 ppm	< 0.001 ppm

NOME: The above are analyses of "leachate" based on the EPA EP TOX test. Organic analyses of sediment samples revealed no contamination above detection limits; typically 50 ppb.

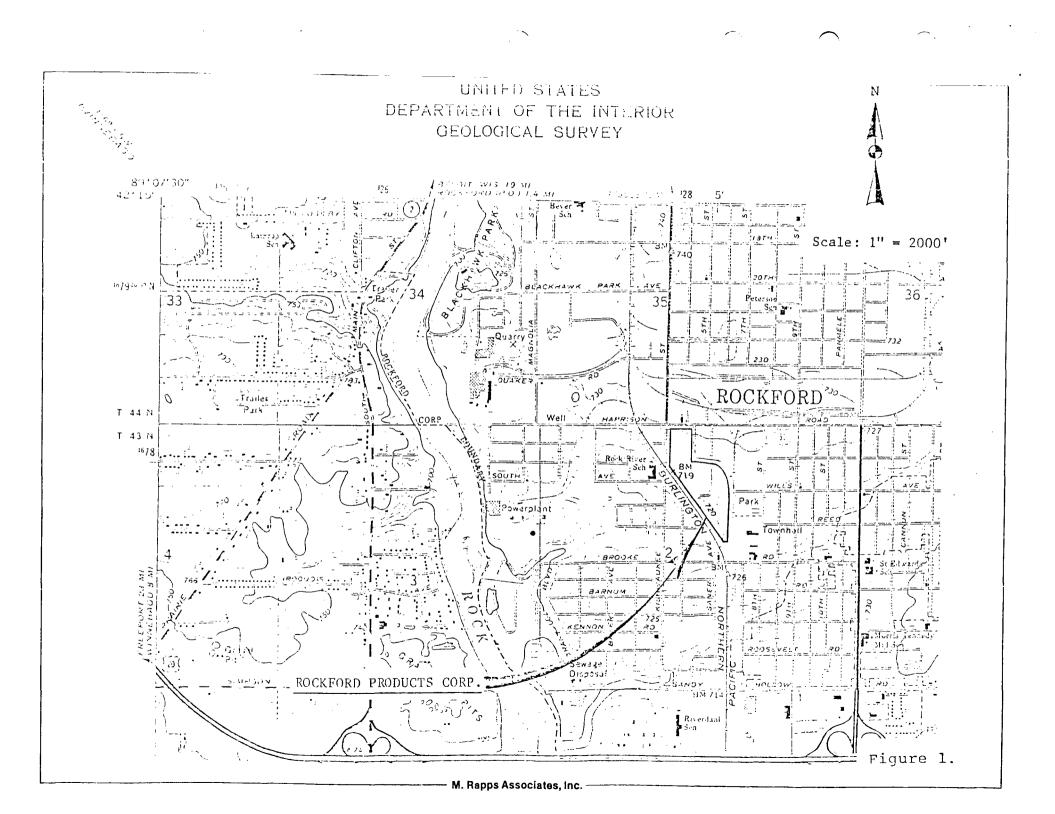
Groundwater Samples

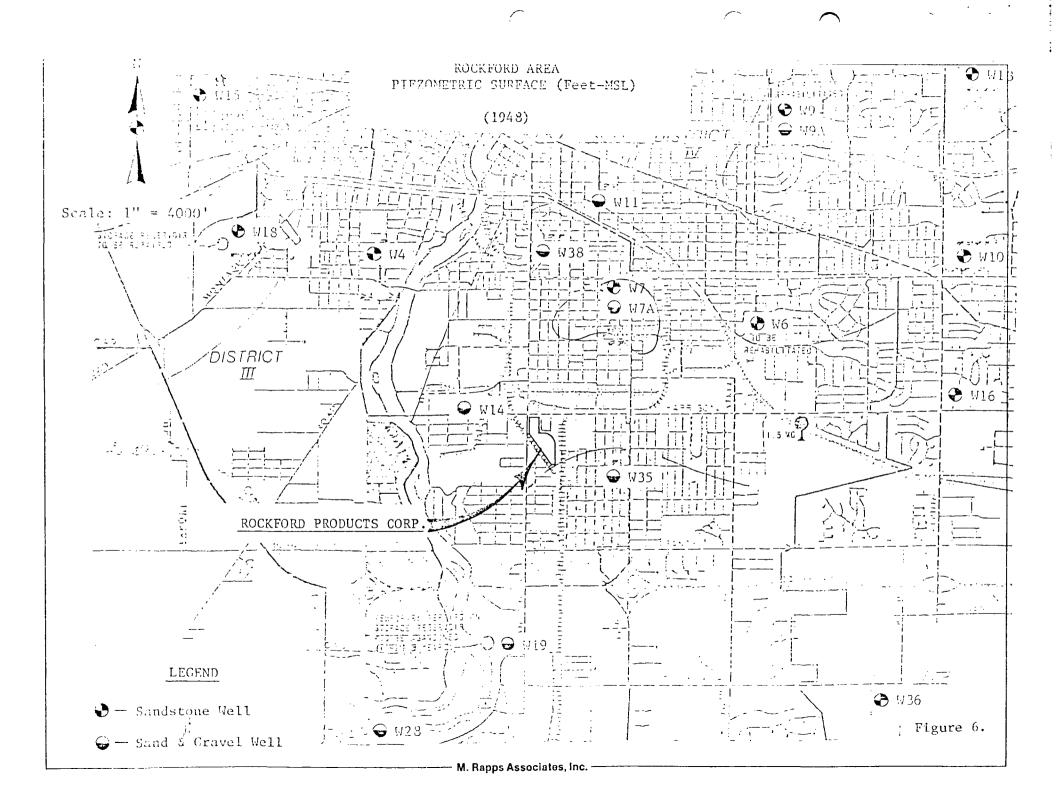
Sample Location

Contaminant (5-8-85)	<u>W-l</u>	W-2	<u>W-3</u>	Mean	Variance
1,1,1 Trichloroethane Trichloroethylene	39 ppb 7 ppb	199 ppb <5(2.5 ppb)	43 ppb 452 ppb	93.6 153.8	5550.2 44,455
Indicator Parameter (1-3-86)					!
S.C. TOC TOX	550 umhos 49 ppm 87 ppb	550 umhos 8.6 ppm <5(2.5 ppb)	550 umhos 2.2 ppm <5(2.5 ppb)	550 19.9 30.6	429.3 1586.7

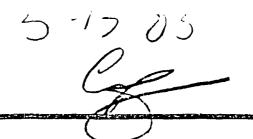
These preliminary analyses indicate the presence of organic contamination in both the pond and in the groundwater; with the solvents 1,1,1-Trichloroethane and Trichloroethylene being common to both. While a greater number of organic contaminants were identified in the pond, the greatest levels of contamination are apparently in the groundwater. Inorganic analyses on sediment samples by the EP-toxicity test method do not reveal metal concentrations out of the ordinary. The same is true of organic analyses of sediment samples, and of indicator parameter analyses of the groundwater.

- M. Rapps Associates, Inc. -





aqualab inc. 3548 35th St. Rockford IL 61109 815-874-2171





ANALYTICAL REPORT

Mr. Steve Reid

Mr. Steve Reid ROCKFORD PRODUCTS 707 Harrison Ave. Rockford, II. 61107 8 May 1985 Sample No. 34388

Sample Description: #1 5.W. Curveet

Date Received: 4/29/85

VOLATILE COMPOUNDS

	ug/l	Compound	ug/l	Compound
	<100	Acrolein	7.	1,2-Trans-Dichloroethene
r-	<100	Acrylonitrile	<5	1,2-Dichloropropane
١.	<5	Benzene	<5	1,3-Dichloropropene .
	<5	Carbon Tetrachloride	<5	Ethylbenzene
	<5	Chlorobenzene	<10	Methylene Chloride
	<5	1,2-Dichloroethane	<20	Methyl Chloride
	25	1,1,1-Trichloroethane	<20	Methyl Bromide
	5.	1,1-Dichloroethane	<10	Bromoform
	<10	1,1,2-Trichloroethane	<5	Dichlorobromomethane
	<10	1,1,2,2-Tetrachloroethane	<10	Chlorodibromomethane
	<20	Chloroethane	<5	Tetrachloroethene
	<50	2-Chloroethylvinyl Ether	<5	Toluene
	<5	Chloroform	15.	Trichloroethene
	10.	l,1-Dichloroethene	<20	Vinyl Chloride
•	<5	Xylene	<5	1,2-Dichlorobenzene
٠.		•	<5	1,3-Dichlorobenzene
			<5	1.4-Dichlorobenzene

aqualab inc. 3548 35th St. Rockford IL 61109 815-8"4-2171



ANALYTICAL REPORT

Mr. Steve Reid ROCKPORD PRODUCTS 707 Harrisch Ave. (Rockford, Il. 61107 8 May 1985 Sample No. 34389

Sample Description: #2 S. EAST CULVERT

Date Received: 4/29/85

VOLATILE COMPOUNDS

ug/l	Compound	ug/l	Compound
ug/1 <100 <100 <5 <5 <5 <10 <10 <20 <50 <5	Acrolein Acrylonitrile Benzene Carbon Tetrachloride Chlorobenzene 1,2-Dichloroethane 1,1-Trichloroethane 1,1-Dichloroethane 1,1-Z-Trichloroethane 1,1,2-Trichloroethane 2-Chloroethylvinyl Ether Chloroform	ug/1 16. <5 <5 <10 <20 <10 <5 <10 <5 <48.	1,2-Trans-Dichloroethene 1,2-Dichloropropane 1,3-Dichloropropene Ethylbenzene Methylene Chloride Methyl Chloride Methyl Bromide Bromoform Dichlorobromomethane
31. <5	1,1-Dichloroethene Xylene	<20 <5 <5 <5	Vinyl Chloride 1,2-Dichlorobenzene 1,3-Dichlorobenzene 1,4-Dichlorobenzene



Mr. Steve Reid ROCKFORD PRODUCTS 707 Harrison Ave. Rockford, II. 61107 8 May 1985 Sample No. 34390

Sample Description: #3 S.E. Po~o

Date Received: 4/29/85

VOLATILE COMPOUNDS

ug/l	Compcund	ug/l	Compound
<100	Acrolein	<5	1,2-Trans-Dichloroethene
<100	Acrylonitrile	<5	1,2-Dichloropropane
∕ ∢ 5	Benzene	<5	1,3-Dichloropropene
√ <5	Carbon Tetrachloride	<5	Ethylbenzene -
<5	Chlorobenzene	<10	Methylene Chloride
<5	1,2-Dichloroethane	<20	Methyl Chloride
27.	1,1,1-Trichloroethane	<20	Methyl Bromide
5.	1,1-Dichloroethane	<10	Bromoform
<10	1,1,2-Trichloroethane	<5	Dichlorobromomethane
<10	1,1,2,2-Tetrachloroethane	<10	Chlorodibromomethane
<20	Chloroethane	<5	Tetrachloroethene
<50	2-Chloroethylvinyl Ether	<5	Toluene
<5	Chloroform	12.	Trichloroethene
<5	1,1-Dichloroethene	<20	Vinyl Chloride
<5	Xylene	<5	1,2-Dichlorobenzene
	4	<5	1,3-Dichlorobenzene
		<5	1,4-Dichlorobenzene

aqualab inc.
3548 35th St.
Rock ord IL 61109
815-874-2171



ANALYTICAL REPORT

Mr. Steve Feid ROCKPORD PRODUCTS 707 Harrisch Ave. Rockford, Il. 61107 8 May 1985 Sample No. 34391

Sample Description: #4 S.E. Sediment

Date Received: 4/29/85

VOLATILE COMPOUNDS

ug/Kg	Compound	ug/K	g Compound
<1000	Acrolein	<50	1,2-Trans-Dichloroethene
<1000	Acrylonitrile	<50	1,2-Dichloropropane
<50	Benzene	<50	1,3-Dichloropropene
< 50	Carbon Tetrachloride	<50	Ethylbenzene
<50	Chlorobenzene	<100	Methylene Chloride
< 50	1,2-Dichloroethane	<200	Methyl Chloride
< 50	1,1,1-Trichloroethane	<200	Methyl Bromide
< 50	1,1-Dichloroethane	<100	Bromoform
<100	1,1,2-Trichloroethane	<50	Dichlorobromomethane
<100	1,1,2,2-Tetrachloroethane	<100	Chlorodibromomethane
<200	Chlomoethane	<50	Tetrachloroethene
<500	2-Chloroethylvinyl Ether	<50	Toluene
<50	Chlomoform	<50	Trichloroethene
<5C	1,1-Dichloroethene	<200	Vinyl Chloride



Mr. Steve Feid ROCKFORD PRODUCTS 707 Harrison Ave. (Rockford, Il. 61107 8 May 1985 Sample No. 34391

Date Received: 4/29/85 1045 S.E. SEDIMENT

E.P. TOXICITY

Arseni c	<0.001	ppm
Barium	0.54	ppm
Cadmium	0.014	ppm
Chromium	0.025	ppm
Lead	0.03	ppm
Mercury	<0.001	ppm
Selenium	<0.005	ppm
Silver	<0.001	ppm

William H. Mottashed Division Manager ---



Mr. Steve Reid ROCKPORD PRODUCTS 707 Harrison Ave. Rockford, Il. 61107 8 May 1985 Sample No. 34392

Sample Description: \$5 S.E. SeamENT 12" Below Surface

Date Received: 4/29/85

VOLATILE COMPOUNDS

ug/Kg	Compound	ug/K	g Compound
<1000	Acrolein	<50	1,2-Trans-Dichloroethene
<1000	Acrylonitrile	<50	1,2-Dichloropropane
<50	Benzene	<50	1,3-Dichloropropene
<50	Carbon Tetrachloride	<50	Ethylbenzene
<50	Chlorobenzene	<100	Methylene Chloride
<50	1,2-Dichloroethane	<200	Methyl Chloride
<50	1,1,1-Trichloroethane	<200	Methyl Bromide
<50	1,1-Dichloroethane	<100	Bromoform
<100	1,1,2-Trichloroethane	<50	Dichlorobromomethane
<100	1,1,2,2-Tetrachloroethane	<100	Chlorodibromomethane
<200	Chloroethane	<50	Tetrachloroethene
<500	2-Chloroethylvinyl Ether	<50	Toluene
<50	Chloroform	<50	Trichloroethene
<50	1,1-Dichloroethene	<200	Vinyl Chloride
	,		-



Mr. Steve Reid
ROCKPORD PRODUCTS
707 Harrison Ave.
Rockford, Il. 61107

8 May 1985 Sample No. 34392

Date Received: 4/29/85 1045 S.E. SEDIMENT 12"BETOW SURFACE

E.P. TOXICITY

Arsenic	<0.001	ppm
Bariun	0.54	ppm
Cadmium	0.005	ppm
Chromium	0.024	ppm
Lead	0.05	ppm
Mercury	<0.001	ppm
Selenium	<0.005	ppm
Silver	<0.001	ppm

William H. MoHaded William H. Mottashed Division Manager : ..._



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ANALYTICAL REPORT

Mr. Chris Berndt ROCKPORD PRODUCTS 707 Harrison Ave. Rockford, Il. 61109 3 January 1986 Sample No. 37825

SAMPLE DESCRIPTION: W1

P.O. 82634

Date Taken: 12/10/85 1400

Date Received: 12/10/85

COD 113. mg/L

Conductivity 550. umhos

TOC 49. mg/L

TOX*

*Laboratory results not available at this writing. Samples lost in transit from main laboratory to reference laboratory. Sample split being resubmitted for TOX analyses.

Toni Gartner

aqualab inc. 3548 - 35th St. Rockford IL 61109 815-874-2171



ANALYTICAL REPORT

Mr. Chris Berndt RCCKFORD PRODUCTS 707 Harrison Ave. Rockford, Il. 61108 3 January 1986 Sample No. 37825

SAMPLE DESCRIPTION: W1

P.O. 82634

Date Taker: 12/10/85 1400

Date Received: 12/10/85

VOLATILE COMPOUNDS

ug/L Compound		ug/L Compound		
	<100.	Acrolein	<5.	1,2-Trans-Dichloroethene
	<100.	Acrylonitrile	<5.	1,2-Dichloropropane
	< 5.	Benzene	<5.	1,3-Dichloropropene
	<5.	Carbon Tetrachloride	<5.	Ethylbenzene
•	<5.	Chlorobenzene	<10.	Methylene Chloride
	<5.	1,2-Dichloroethane	<20.	Methyl Chloride
	39.	1,1,1-Trichloroethane	<20.	Methyl Bromide
	<5.	1,1-Dichloroethane	<10.	Bromoform
	<:.0.	1,1,2-Trichloroethane	<5.	Dichlorobromomethane
	<:0.	1,1,2,2-Tetrachloroethane	<10.	Chlorodibromomethane
	<20.	Chloroethane	<5.	Tetrachloroethene
	<50.	2-Chloroethylvinyl Ether	<5.	Toluene
	∢5.	Chloroform	7.	Trichloroethene
	∢5.	1,1-Dichloroethene	<20.	Vinyl Chloride
				-

Tori Gartner



Mr. Chris Berndt ROCKFORD PRODUCTS 707 Harrison Ave. Fockford, Il. 61109 3 January 1986 Sample No. 37826

SAMPLE DESCRIPTION: W.

P.O. 82634

Date Taken: 12/10/85 1430

Date Received: 12/10/85

COD 27. mg/L
Conductivity 550. umhos

TOC 8.6 mg/L

TOX*

*Laboratory results not available at this writing. Samples lost in transit from main laboratory to reference laboratory. Sample split being resubmitted for TOX analyses.

A Gustaur Toni Gartner ::.=

aqualab inc. 3548 35th St. Rockford IL 61109 815-874-2171



ANALYTICAL REPORT

Mr. Chris Berndt ROCKFORD PRODUCTS 707 Harrison Ave. Rockford, Il. 61108 3 January 1986 Sample No. 37826

SAMPLE DESCRIPTION: W2

P.O. 82634

Date Taken: 12/10/85 1430

Date Received: 12/10/85

VOLATILE COMPOUNDS

ug/L Co	ompound	ug/L	Compound
<100.	Acrolein	<5.	1,2-Trans-Dichloroethene
<100.	Acrylonitrile	<5.	1,2-Dichloropropane
<5.	Benzene	<5.	1,3-Dichloropropene
< 5.	Carbon Tetrachloride	<5.	Ethylbenzene
<5.	Chlorobenzene	<10.	Methylene Chloride
<5.	1,2-Dichloroethane	<20.	Methyl Chloride
199.	1,1,1-Trichloroethane	<20.	Methyl Bromide
<5.	1,1-Dichloroethane	<10.	Bromoform
<10.	1,1,2-Trichloroethane	<5.	Dichlorobromomethane
<10.	1,1,2,2-Tetrachloroethane	<10.	Chlorodibromomethane
<20.	Chloroethane	<5.	Tetrachloroethene
<50.	2-Chloroethylvinyl Ether	<5.	Toluene
<5.	Chloroform	<5.	Trichloroethene
<5.	1,1-Dichloroethene	<20.	Vinyl Chloride
	•		

Topi Gartner

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Mr. Chris Berndt ROCKFORD PRODUCTS 707 Harrison Ave. Fockford, Il. 61109

3 January 1986 Sample No. 37827

SAMPLE DESCRIPTION: W3

P.O. 82634

Date Taken: 12/10/85 1415

Date Received: 12/10/85

COD

17.

mg/L

Conductivity

550.

umhos

TOC

2.2

mg/L

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TOX*

*Laboratory results not available at this writing. Samples lost in transit from main laboratory to reference laboratory. Sample split being resubmitted for TOX analyses.

I farfus Tonf Gartner Aqualab inc.
3548 35th St.
Fockford IL 61109
815-874-2171



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ANALYTICAL REPORT

Mr. Chris Berndt RCCKFORD PRODUCTS 707 Harrison Ave. Rockford, Il. 61108 3 January 1986 Sample No. 37827

SAMPLE DESCRIPTION: W3

P.O. 82634

Date Taken: 12/10/85 1415

Date Received: 12/10/85

VOLATILE COMPOUNDS

ug/L Compound		ug/L	Compound
<100.	Acrolein	<5.	1,2-Trans-Dichloroethene
<100.	Acrylonitrile	<5.	1,2-Dichloropropane
<5.	Benzene	<5.	1,3-Dichloropropene
<5.	Carbon Tetrachloride	<5.	Ethylbenzene
<5.	Chlorobenzene	<10.	Methylene Chloride
<5.	1,2-Dichloroethane	<20.	Methyl Chloride
43.	1,1,1-Trichloroethane	<20.	Methyl Bromide
<5.	1,1-Dichloroethane	<10.	Bromoform
< 1.0.	1,1,2-Trichloroethane	<5.	Dichlorobromomethane
<1.0.	1,1,2,2-Tetrachloroethane	<10.	Chlorodibromomethane
<20.	Chloroethane	<5.	Tetrachlorcethene
<50.	2-Chloroethylvinyl Ether	<5.	Toluene
<5.	Chloroform	452.	Trichloroethene
∢5.	1,1-Dichloroethene	<20.	Vinyl Chloride

Tom Gartner



Mr. Chris Benndt ROCKEORD PRODUCTS Of Marrison Ave. Rockford, Il. 61109 15 January 1986 Sample No. 37825-27

SAMPLE DESCRIPTION: We____ Samples P. __ . 82634

Date Taken: 12/10/85

Date Received: 12/10/85

Time-Taken	Sample Description	TOX, mg/L
1400	W1	0.087
1430	W2	<0.005
1415	жз	<0.005
1410		

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